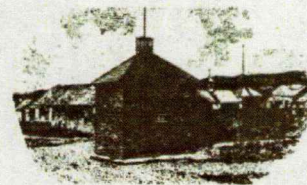


VERN L. BURDICK  
SHERIFF

OFFICE OF  
**SHERIFF of CHOUTEAU COUNTY**  
FORT BENTON, MONTANA 59442  
*"The Birthplace of Montana"*



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Emergency: 911

*Via Electronic Comment Filing System*

November 13, 2019

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: Notice of *Ex Parte*, PS Docket No. 07-114

Dear Ms. Dortch:

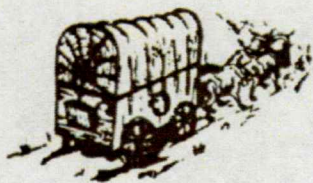
I am the Director of the Chouteau County Sheriff's Office 9-1-1 Communications Center. I write to voice my support for APCO's position that the FCC's draft z-axis order must be changed to ensure that 9-1-1 professionals receive location information when our citizens place an emergency call from inside buildings. I believe the order being considered by the FCC will have dire implications for not only our professionals taking the 9-1-1 calls, but especially for the population we serve, our public. If allowed to pass as written, this order will take 9-1-1 backwards instead of in the forward momentum of the profession as a whole.

My agency processes just under 900 9-1-1 calls per year, with approximately 67% originating from cell phones. Chouteau County is expansive, almost 4000 square miles of rural Montana. The population of the county is approximately 6000 citizens. As you can see the challenge to us in the 9-1-1 center is not the number of calls, but the location of the callers. Time is of the essence in response in our rural area. Every citizen counts and for those staying in our hotels or located in buildings where there are floor levels or rooms, the challenge once responders are dispatched on a call that may take over an hour to reach is finding them. Seconds save lives.

I am having a difficult time with the reason behind making it more difficult to serve our citizens. I am having a hard time with the reasoning behind making the job of dispatching more difficult. 9-1-1 Communications Centers like mine do not have the resources to create and maintain indoor maps for buildings in our jurisdictions, nor should we be expected to do so. Even if we did, we would not have the ability to translate HAE to a floor, or visualize a three-dimensional point in space.

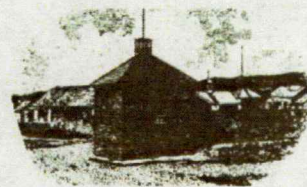
I do not want to assume that our law enforcement, fire, and EMS responders in the field will have devices capable of measuring altitude as HAE, and will easily be able to match their





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measurements to what's received for the 9-1-1 caller. In fact, this is an unrealistic expectation with agencies struggling to keep up with technologies and the monies required for such technologies. Volunteer agencies will certainly struggle in their ability to remain relevant in the public safety community. This will be especially difficult and even unsafe during emergencies such as a building fire or active shooter incident when first responders cannot be looking down at a device.

I urge you to consider requiring wireless carriers to provide a floor number as part of the z-axis information. Requiring wireless carriers to provide actionable location information about 9-1-1 callers, using any and all available technologies, will save lives.

Thank you

Kimberly D Burdick, CPE  
Director  
Chouteau County Sheriff's Office  
9-1-1 Communications Center